

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

TREVOR FITZGIBBON

Plaintiff,

V.

JESSELYN A. RADACK

Defendant.

Case No. 3:19-cv-477-REP

## DECLARATION OF TREVOR FITZGIBBON

Trevor Fitzgibbon states as follows, under penalty of perjury, as and for his Declaration:

1. I am over 21 years of age and otherwise competent to make this Declaration. I have personal knowledge of the statements contained herein based upon (a) documents and information in my possession and control, (b) my personal observations, memory, and experiences, (c) public information and statements by Defendant, Jesselyn Radack, on the Internet and on Twitter, and (d) documents known or reasonably believed to be in the possession, custody and control of others. The statements in this Declaration are true and accurate to the best of my knowledge, information and belief.

2. I am the Plaintiff in this action. I authorized my counsel to file this action.

I affirm that the facts alleged in my complaint and amended complaint are truthful and accurate to the best of my knowledge and belief.

3. I have reviewed the Statement of Jurisdictional Facts set forth in my opposition to Defendant's motion to dismiss for lack of personal jurisdiction. I affirm that the facts stated therein are truthful and accurate to the best of my knowledge and belief.

4. All the links in my amended complaint and in my memorandum in opposition to the Defendant's motion to dismiss for lack of personal jurisdiction are active as of November 5, 2018.

5. I make this Declaration in support of my Opposition to the Defendant's motion to dismiss.

Further the affiant saith not.

In accordance with 28 U.S.C. § 1746, I declare, certify, verify, and state under penalty of perjury that the foregoing is true and correct.

Executed in Mooresville, North Carolina, on November 5, 2019

/s/

TREVOR FITZGIBBON